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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

15 UNITED STATES OF AMERICA, ) CR 17-00191-JST  
16 Plaintiff, )  
17 v. ) STIPULATION AND PROPOSED ORDER TO  
18 KENNETH TAYLOR, ) EXCLUDE TIME UNDER THE SPEEDY  
19 SHARON RINGGENBERG, and ) TRIAL ACT  
20 CRAIG SCOTT, )  
Defendants. )  
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22 The parties hereby STIPULATE and AGREE as follows:

23 1. On April 14, 2017, a federal grand jury in the Northern District of California returned a  
24 five-count Indictment alleging that Defendants Kenneth Taylor, Sharon Ringgenberg, and Craig Scott  
25 conspired to and did commit wire fraud with respect to a business providing fraudulent standby letters of  
26 credit and proof of funds statements, in violation of 18 U.S.C. §§ 1343 and 1349, and that Kenneth  
27 Taylor signed and filed false 2009 and 2010 federal income tax returns in which he failed to report  
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income from the fraud scheme, in violation of 26 U.S.C. § 7206(1).

2. On May 22, 2017, the Court issued a Protective Order regarding the discovery materials that the government plans to serve on Defendants. *See* Doc. No. 17.

3. On May 25, 2017, the government served initial discovery on all defendants. The government estimates that this production contains in excess of 70,000 pages of documents.

4. On May 26, 2017, Kenneth Taylor and Craig Scott, represented by their respective counsel, and the government, represented by Assistant U.S. Attorney Colin Sampson, appeared for an initial status hearing before United States District Judge Jon S. Tigar. The matter was continued to July 21, 2017, in order for counsel to review recently-produced discovery.

Accordingly, the United States and Defendants Kenneth Taylor, and Craig Scott, hereby STIPULATE AND AGREE that time under the Speedy Trial Act be excluded from May 26, 2017, to July 21, 2017, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (b)(iv) to allow for effective preparation of counsel, taking into account the exercise of due diligence.

Respectfully submitted,

BRIAN J. STRETCH  
United States Attorney

Dated: May 30, 2017.

/s/ Colin Sampson  
COLIN SAMPSON  
Assistant United States Attorney  
GREGORY D. BERNSTEIN  
Trial Attorney

Dated: May 30, 2017.

/s/ *Martha Boersch*  
**MARTHA BOERSCH**  
Attorney for Defendant Kenneth Taylor

Dated: May 30, 2017.

/s/ John Paul Reichmuth  
JOHN PAUL REICHMUTH  
Attorney for Defendant Craig Scott

## **ORDER**

Pursuant to the Stipulation of the United States of America and Defendants Kenneth Taylor and Craig Scott, and for good cause shown therein, time under the Speedy Trial Act is excluded from May 26, 2017, to July 21, 2017, pursuant 18 U.S.C. §§ 3161(h)(7)(A) and (b)(iv) because the ends of justice outweigh the interests of the public and the Defendants in a speedy trial, to allow for effective preparation of counsel, taking into account the exercise of due diligence, in order for the Defendants to review discovery served upon them by the United States and to prepare any pretrial motions, among other matters.

IT IS SO ORDERED.

Dated: June 2, 2017

**THE HONORABLE JON S. TIGAR  
UNITED STATES DISTRICT JUDGE**